PROVISIONAL STORMWATER MANAGEMENT PLAN (SWMP) DEVELOPMENT AND IMPLEMENTATION ROADMAP FOR JOINT REGION MARIANAS

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1.0 JOINT REGION MARIANAS

Joint Region Marianas includes Navy Base Guam (NBG) and Andersen Air Force Base (AAFB). Both consist of several non-contiguous areas. NBG includes Main Base (including Camp Covington), Polaris Point, the Naval Munitions Site, Defense Fuel Support Point (DFSP), Naval Hospital, and Navy Communications Site Barrigada. AAFB includes the Main Base, Northwest Field and Andersen South.

1.1 HYDROLOGY¹ of JOINT REGION MARIANAS

Main Base of Navy Base Guam (NBG) is within the Apra Watershed. Several rivers flow from a general east-to-west direction across NBG. The Masso River is adjacent to the northern boundary of NBG and is just north of the Apra Watershed boundary. The river flows into the Philippine Sea. The Sasa River flows from east to west in the northern section of NBG and discharges to Sasa Bay. The Aguada River is south of the Sasa River and also flows from east to west and discharges to Sasa Bay. The Atantano River is south of the Aguada River and flows from east to west into Inner Apra Harbor after being joined by the Tenjo River to the east of NBG. There are Based on the original 1998 survey and the recent 2007 survey, there are approximately 343 acres of wetlands in 48 separate wetlands within and adjacent to NBG. In addition, there is a large 100-acre wetland complex in Camp Covington.

Naval Munitions Site (formerly Naval Magazine): A total of nine major perennial stream courses exist within Naval Munitions Site. Four of the streams (Imong, Sadog Gago, Maulap, and Almagosa) have relatively steep gradients and flow into Fena Reservoir, which was formed from the construction of a dam. Three of the perennial streams (Bonya, Talisay, and Maemong) converge with the Maagas River before meeting the Talofofo River east of the Naval Munitions Site. The Maagas River is also known as the Lost River because it disappears underground and resurfaces again. The Mahlac River flows southeast out of the Naval Munitions Site eventually joining the Maagas River. The Mahlac, Bonya, Talisay, Maemong, and Maagas rivers have more gentle gradients than the streams flowing into Fena Reservoir, which results in broad river basins. The Naval Munitions Site has 1,149 acres of wetlands.

Naval Computer and Telecommunications Station Finegayan (NCTS), Navy Communications Site Barrigada (NCS Barrigada): Because of the high permeability of the limestone substrate, no streams or other natural surface water drainage features occur on NCTS or at NCS Barrigada. NCS Barrigada has approximately 3.5 acres of wetlands.

Naval Hospital is north of the Fonte River, which flows west into Asan Bay east of Adelup.

Andersen Air Force Base (AAFB) and Andersen South: Because of the high permeability of the limestone substrate, no streams or other natural surface water drainage features occur on Andersen AFB or Andersen South. Rainfall percolates into limestone cavities or is channeled into underground injection control (UIC) wells throughout Andersen AFB. Stormwater runoff from impervious surfaces is currently directed via concrete-lined culverts to UIC wells, which are permitted and regulated by GEPA. No wetlands have been identified on Andersen AFB or at Andersen South.

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¹ Joint Region Marianas Final Draft INRMP, July 2011

1.2 IMPAIRED WATERS

Navy Base Guam is in the Apra Harbor and Agat Bay watersheds. These waters are on the Guam 2008 303(d) list of impaired waters for PCB, chlordane and dioxin in fish tissues. These are not stormwater runoff pollutants of concern, as stormwater runoff is not the source of these pollutants.

No other JRM facilities are in watersheds with impaired waters.

2.0 REGULATORY BACKGROUND

The federal regulations on storm water discharges stem from the 1977 Clean Water Act (CWA) (33 United States Code 1251 et. seq.), as amended in 1987, which established a two-phase regulatory program. Phase I was put into effect through storm water regulations promulgated by the U.S. Environmental Protection Agency (USEPA) in November 1990 (40 CFR 122.26). Phase I required NPDES storm water permits for a large number of priority sources, including industrial sites, construction areas that disturb greater than five acres, and municipal separate storm sewers (MS4s) serving populations over 100,000, which are considered large or medium MS4s. The Phase I MS4 regulations generally require MS4s to reduce discharges of pollutants to the maximum extent practicable and to prohibit illicit discharges into the MS4. The Phase II regulations (40 CFR 122.33) published in December 1999 expanded the program to include small MS4s, which serve populations between 50,000 and 100,000, construction sites between one to five acres, previously exempted industrial activities associated with municipalities, and other municipalities designated by USEPA.

Although Guam does not fall under the census defined population that would require an MS4 permit, US EPA Region IX made a preliminary determination to designate the island of Guam as a small MS4 and to require NDPES permit coverage from the Guam Department of Public Works and from DoD. The primary basis for this designation is that based on current data available to US EPA, and based on anticipated future development on Guam, US EPA has determined that discharges from current sources and future developments will "contribute to a violation of a water quality standard or is a significant contributor of pollutants to waters of the United States." Data presented by US EPA included bacteriological impairments in Northern Guam Beaches identified in the 2008 Integrated Report, and a broad reasoning that "numerous new facilities" to accommodate the Planned Relocation of U.S. Marines to Guam from Okinawa will increase the quantity of pollutants discharged in stormwater.

The preliminary designation memorandum was signed by the US EPA Regional Administrator on February 8, 2011. On the same date USEPA also issued a letter to Joint Region Marianas (JRM) stating that an individual MS4 NDPES permit application is required for DoD facilities on Guam.

USEPA indicated that permit application requirements include:

- 1. An estimate of the square mileage served by the small MS4.
- 2. A StormWater Management Plan (SWMP) including BMPs addressing each of the six minimum control measures set forth in 40 CFR 122.33(b)(1) (6), designed to reduce pollutants to the maximum extent practicable and protect water quality.
- 3. Measureable goals for each BMP proposed for the SWMP including, as appropriate, the time frame for implementation of the BMPs.
- 4. The person or persons responsible for implementing or coordinating the SWMP.

On May 17, 2011, the Department of the Navy (DoN) responded to US EPA's letter requesting the following:

- 1. Modification of the notice on the proposed action and preliminary designation to allow submittal of public comments on the nature and scope of the designation prior to permit application submittal.
- 2. US EPA create working groups consisting of the various entities to be regulated and engage in discussions with these groups regarding implementation approaches and schedules.
- 3. Extension of the due date for the permit for DoN activities of at least 365 days after the start of the new fiscal year beginning 1 October 2011.

US EPA responded to DoN's letter on June 20, 2011 with the following:

- 1. A six-month extension is granted for a submittal of an NPDES permit application by DoN. The revised deadline for submittal of the permit application is February 22, 2012.
- 2. US EPA stated that they do not believe working groups are necessary.
- 3. It is not US EPA's intent to require a "completed" SWMP fully implementing BMPs which addresses each of the six minimum control measures at the time of permit application. "The SWMP may be more of a roadmap describing how DON intends to develop and implement a program addressing the six minimum control measures within a specific timeframe."

On February 22, 2012, JRM provided comments to USEPA on their proposed designation.

2.1 CURRENT STORMWATER PERMIT COVERAGE FOR JRM PROPERTIES ON GUAM The Navy has facilities that engage in industrial activities and have stormwater discharges to Waters of the U.S. and therefore is required to comply with the regulations covering stormwater discharges associated with industrial activities.

In response to the 1990 EPA regulations, the Naval Base facilities on Guam elected to obtain coverage under the EPA NPDES Baseline General Permit authorizing discharge of stormwater associated with industrial activities. In 1995, EPA modified their Multi-Sector General Permit (MSGP) to include industrial activities at Naval Base facilities. Naval Factilities Marianas (NAVFAC Marians) submitted a Notice of Intent (NOI) for coverage under the MGSP. Permit No. GUR05A004 was subsequently issued to Naval Base, Guam. After this permit expired in 2000, NAVFAC MAR submitted a Notice of Intent for the MSGP 2000 permit. Permit No. GUR05A008 was issued to Naval Base in Guam. MSGP 2000 expired on October 2005. Facilities that obtained coverage under MSGP 2000 prior to expiration are automatically granted an administrative continuance of permit coverage. On September 29, 2008, EPA issued the new Multi-Sector General Permit which authorizes the discharge of stormwater associated with industrial activities in accordance with the terms and conditions of this new permit. NAVFAC MAR submitted a Notice of Intent (NOI) for permit overage and permit No. GUR05A211 was subsequently issued to Naval Base, Guam on June 4, 2009.

Industrial Stormwater Pollution Prevention Plans (SWPPP) have been prepared for various industrial facilities and activities located in Naval Base Guam (NBG) that falls within established MSGP SIC categories. The NOI for NAVFAC MAR includes facilities covered in the following annexes;

- 1. Waterfront Annex,
- 2. Ordnance Annex,
- 3. Naval Facilities Marianas, and
- 4. Defense Fuel Support Point (DFSP) Guam.

The Industrial SWPPP for the Naval Base Activities in Guam is a comprehensive compliance document, developed to meet the federal and local requirements described above. SWPPP volumes prepared for each Annex include an Annex description, non-stormwater discharge elimination requirements, facility-specific Best Management Practices (BMPs), training and a description of monitoring and reporting requirements. The Industrial SWPPP establishes policy, responsibilities, procedures, and technical guidance on the prevention and elimination of pollution associated with stormwater runoff from industrial areas at the listed Navy Annexes.

In addition to industrial permit coverage under the MSGP, for construction projects 1 acre or larger with anticipated discharges to surface waters NAVFAC Marianas obtains NPDES Construction General Permit (CGP) coverage by submitting NOIs to US EPA and ensuring that contractors have prepared and are complying with construction SWPPPs that meet the CGP requirements. DoD has also committed to obtain NPDES CGP coverage for all Defense Policy Review Initiative (DPRI) projects 1 acre or larger, whether or not there are anticipated discharges to surface waters. NAVFAC Marianas contractors also obtain Clearing and Grading Permits where required under the Guam Erosion Control Regulations for all construction activities, regardless of size or runoff discharge location.

All NAVFAC Marianas projects are consistent with the policies, practices and BMPs for construction and post-construction outlined in the 2006 CNMI/Guam Stormwater Management Manual.

Various requirements covered under the MSGP and CGP mirror SWMP requirements. Therefore JRM will continue to implement the requirements of the current MSGP and CGP permits with no change after the SWMP is implemented.

2.2 SMALL MS4 REQUIREMENTS

A regulated small MS4 operator must develop, implement, and enforce a SWMP designed to reduce the discharge of pollutants from their MS4 to the "maximum extent practicable" to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act (CWA). Small MS4 SWMP must include the following six minimum control measures:

- 1. Public Education and Outreach
- 2. Public Participation / Involvement
- 3. Illicit Discharge Detection and Elimination
- 4. Construction Site Runoff Control
- 5. Post Construction Runoff Control
- 6. Pollution Prevention / Good Housekeeping

In addition to the above, the small MS4 operator must identify its selection of BMPs and measureable goals for each minimum measure in the SWMP. The evaluation and assessment of those chosen BMPs and measurable goals must be included in periodic reporting to the NPDES permitting authority.

2.3 JRM's COMPLIANCE WITH THE PROPOSED DESIGNATED MS4

JRM supports US EPA's goal of improving water quality throughout Guam although we believe that since our facilities are covered under the current MSGP, federal and local construction permitting requirements, and DoD polices such as Low Impact Development (LID), we are already meeting a large portion of SWMP requirements and protecting water quality from stormwater runoff impacts. While JRM recognizes that stormwater pollutants is a significant contributor to water quality impacts, JRM does not agree with the supporting data and linkage used by USEPA for this preliminary designation. However, as required, JRM has provisionally applied for a NPDES permit as required by

USEPA that contains BMPs, proposed schedules, and other information consistent with the develop of a SWMP for a newly designated MS4.

3.0 JRM SWMP

This roadmap for a Storm Water Management Plan (SWMP) was prepared by JRM pursuant to USEPA's letter of February 9, 2011 and requiring a plan for an SWMP. The final SWMP will:

- Provide a framework for identifying, assigning, and implementing best management practices (BMPs) intended to reduce the discharge of pollutants from JRM facilities and to protect water quality.
- 2) Serve as a planning and guidance document to be used by military personnel, civilian staff, contractors, and members of the general public at JRM facilities who have authority to access the base and outlying areas.
- 3) Function as a living document that is amended to address changes in the Small MS4 NPDES Permitting requirements, JRM organizational structure, responsibilities, and goals.
- 4) Identify techniques and measurable goals for measuring BMP effectiveness.
- 5) Define a 5-year schedule for Storm Water Management Program implementation to comply with the requirements of the proposed U.S. EPA individual NDPES Permit for a Small MS4.

3.1 PROPOSED ORGANIZATION OF THE JOINT REGION MARIANAS STORMWATER PROGRAM

The position responsible for coordinating and implementing the SWMP for Joint Region Marianas is the EV1 (Environmental Compliance Engineer) in the EV Core. Responsibilities associated with implementation of the SWMP at any given installation will be executed by that installation's EV and Public Works staff and executed in-house or via contractors and consultants as required. It is anticipated that as additional data is gathered under the MS4, the SWMP organization structure may change based on revised program requirements and goals.

3.2 PROPOSED JRM SWMP DEVELOPMENT AND IMPLEMENTATION

3.2.1 Applicable MS4 facilities: CWA stormwater regulations apply to discharges to waters of the U.S. from municipal separate storm sewers, which means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels or storm drains). As such, areas to be included in JRM MS4 will be facilities with municipal separate storm sewers as defined by the regulation and that discharge to surface waters of Guam.

Any DoD facilities that contain physical connections to the Guam Department of Public Works MS4 that is known or suspected to drain into the surface waters of Guam will not be included in the JRM MS4, but will comply with all requirements of the DPW MS4. Areas with no discharges to any Waters of the U.S. will not be included.

3.2.2 SWMP Development and Implementation: Upon issuance of a final NPDES permit by USEPA, the SWMP will be finalized based upon the permit requirements and this roadmap. The final SWMP will describe a five-year program to reduce pollutants in storm water discharges to the maximum extent practicable. The final SWMP will include the following five parts:

Table 1-1. Square Mileage of Facilities Managed under Joint Region Mariana

Facility Name	Square Miles
Naval Base Guam	5.36
Naval Munitions Site	13.5
Defense Fuel Support Point (DFSP)	0.68*
Off-Base Housing (Apra View, Apra Heights, Turner Road)	0.41
Nimitz Hill	DPW MS4 (0.31)
Naval Hospital	0.18
Communications Site Barrigada	2.2

^{*} DFSP is covered in its entirety under the MSGP

- (1) Minimum Control Measures. The Small MS4 General Permit specifies that a program must address the requirements of six minimum control measures (MCMs) through implementation of storm water BMPs. This plan will be organized according to the six MCMs and describe the BMPs to be implemented to address potential pollutants, implementation schedule, and measurable goal(s) (e.g., milestones) for each BMP. The MCMs are:
 - (a) Public Education;
 - (b) Public Participation;
 - (c) Illicit Discharge Detection and Elimination;
 - (d) Construction Site Storm Water Runoff Control;
 - (e) Post-Construction Storm Water Management; and
 - (f) Pollution Prevention/Good Housekeeping for Municipal Operations.
- (2) Measurable Goals. The BMPs for each MCM are associated with both indirect and direct measurable goals. Indirect measurable goals are based on the assumption that the use of specific BMPs is indirectly effective in the overall reduction of storm water pollution and the future protection of water quality (e.g., public education and participation). Direct measurable goals focus primarily on specific and direct impacts to receiving waters (e.g., illicit discharge elimination).
- (3) Responsible Parties. BMP implementation will require the support and coordination of multiple organizations. A lead organization will be responsible for oversight of each BMP. Support organizations may be involved in implementation or coordination activities. The lead and support organizations will be listed in the *Measurable Goals* section of the SWMP for each BMP.
- (4) Implementation Year. Each BMP will be associated with an implementation year in which the BMP shall be initiated or continued. In some cases, BMP implementation is ongoing (e.g., performing inspections), and in some cases it consists of a one-time task that may only require maintenance or review and update in the future (e.g., development of a stormwater logo).
- (5) Outcome Level. Each BMP has an associated outcome level which will help to categorize and describe the desired results or goals of programs and control measures. The outcome levels are: Level 1 documenting activities.
 - Level 2 raising awareness,
 - Level 3 changing behavior,

Level 4 – reducing loads from sources,

Level 5 - improving runoff quality, and

Level 6 – protecting receiving water quality.

Identifying these outcome levels for each BMP will support future program effectiveness assessments.

3.3 PROPOSED NPDES PERMIT CONDITIONS SPECIFIC FOR SWMP:

As stated earlier, certain ongoing processes and procedures conducted by JRM already fully or partially satisfy the intent and requirements for many of the minimum control measures. Table 3-1 summarizes existing processes and procedures, and potential modified or new processes that would be undertaken to satisfy SWMP requirements. It also includes potential measurable goals for the BMPs. Table 3-2 identifies other permit requirements

- Public Education and Outreach The Permittee shall develop and implement a public
 education and outreach program to distribute educational materials to JRM base personnel,
 base residents, base school children, contract workers and vendors, and base tenants. The
 Permittee shall consider educational presentations at schools or other appropriate audiences,
 and consider publishing articles in base publications. Outreach and educational activities shall
 emphasize the following:
 - A) Promote awareness of impacts of storm water discharges to water bodies via development of programs such as Earth Day outreach or stormdrain stenciling.
 - B) Pollutant sources in storm water.
 - C) Illicit connections and discharges.
 - D) Measures everyone can do to reduce pollutants in storm water.

In Permit Year 1, the Permittee will develop strategies for a Public Education and Outreach Program, and request for funding as required for subsequent years. From Permit Year 2, the Permittee will begin implementation of all strategies developed in the Public Education and Outreach Program.

- 2. Public Participation / Involvement The Permittee shall include base personnel and dependents in the development of the SWMP, and participate in SWMP activities that provides additional educational value and ownership. In Permit Year 1, the Permittee will develop a Public Participation / Involvement program that may consider activities such as: making the SWMP available to the public on Joint Region Marianas' web site and tracking comments on the site, storm drain stenciling, Earth Day functions, Adopt-a-Road or Adopt-a-Stream program, or a "branding" strategy for public awareness and ownership. The Permittee will also request for funding as required for subsequent years and begin implementation of some activities in the Public Participation / Involvement program. From Permit Year 2, the Permittee will begin implementation of all strategies identified in the Public Participation / Involvement program.
- 3. Illicit Discharge Detection and Elimination The Permittee shall:
 - A) Update the storm sewer mapping
 - B) continue to perform dry weather inspections as part of Industrial SWPPP requirements,
 - C) continue to perform <u>30</u> routine and comprehensive inspections as part of MSGP requirements,
 - D) conduct cross connection surveys every 5 years.

In addition, the Permittee shall develop a process to review and approve connection requests to DoD drainage facilities by non-DoD requestors.

- 4. Construction Site Runoff The Permittee shall continue to:
 - A) develop site-specific SWPPPs and obtain NPDES CGP coverage for applicable construction projects,
 - B) Comply with Guam Erosion and Sediment Control regulations, incluing requiring contractors to obtain Clearing and Grading permits and develop and implement BMPs for all construction projects with disturbance that may impact stormwater,
 - C) Require contractors to develop Environmental Protection Plans for construction projects and comply with the Navy's Environmental Management System,
 - D) perform a minimum of 10% spot construction site inspections using in-house environmental staff, and
 - E) provide annual construction training to CMEs and ETs.
- 5. Post Construction Site Runoff Control The Permittee shall continue to comply with:
 - A) the 2006 CNMI & Guam Stormwater Management Manual in project development,
 - B) Low Impact Development requirements in Section 438 of the Energy Independence and Securities Act of 2007, and
 - C) DoD's Low Impact Development design policies contained in Unified Facilities Criteria 3-210-10.

In addition, the Permittee shall in Permit Year 1 will develop an inspection procedure for permanent post construction stormwater BMPs/IMPs to: monitor deficiencies and maintenance concerns, and provide inspection findings to appropriate parties for corrective actions.

- 6. Pollution Prevention and Good Housekeeping The Permittee will continue with the following existing activities:
 - A) conducting quarterly routine industrial facility inspections,
 - B) conduct annual comprehensive industrial facility inspections,
 - C) conduct annual wet weather inspections,
 - D) provide annual training to personnel,
 - E) perform stormwater discharge sampling,
 - F) perform periodic drainage maintenance, and
 - G) maintain a listing of all tenants on JRM properties and tenant agreements / permits.

In addition to the above, the Permittee will undertake, develop and/or implement the following:

- A) In Permit Years 2 5, complete a survey of all drainage facilities, note maintenance requirements, and update drainage facility inventory and maps. Beginning in Permit Year 3, 20% of all MS4 drainage facilities will be inspected annually to initiate a 5-year inspection and cleaning cycle.
- B) In Permit Year 1, develop: a drainage inspection & cleaning program; and explore additional methods for source reduction strategies for pollutants if identified.

Table 3-1 - MINIMUM CONTROL MEASURES: Existing or New Compliance Measures or Processes, Proposed Measurable Goals

	Existing Processes or	Potential New or	Potential Measurable
	_	Modified Processes	Goals
(1) Public Education and Outreach	Existing Processes or compliance measures Annual EV training for all base tenatns		
(2) Public Participation / Involvement	* Base/beach clean-ups * Earth Day outreach participation	* "Branding" (design logo) *Storm drain stenciling *Adopt-a-stream and/or Adopt-a-road programs *Post SWMP information on JRM website for public viewing and comments	educational flyers to established partners or identified posting areas *In permit year 1, develop stormwater logo * In permit year 2, evaluate and target areas for storm drain stenciling. Begin storm drain stenciling in permit year 3 and complete by the end of permit year 5 *Continue at least one clean-up function annually *Include stormwater runoff information in Earth Day outreach

			*In permit year 1, explore feasibility of implementing an "adopt-a-stream" and/or "adopt-a-road" program
(3) Illicit Discharges and Elimination	*Cross connection surveys *MSGP dry weather inspections *routine and comprehensive MSGP inspections	*develop drainage connection or project review and approval process *develop and distribute educational flyers for base tenants & personnel addressing illicit connections and discharges	*develop procedures for drainage connection review & approval in pemit year 1 *In permit year 2, update illicit discharge survey program *Starting in year 3, implement illicit discharge program
(4) Construction Site Runoff Control	*Comply with NPDES CGP for applicable projects *Develop & implement SWPPP for applicable projects *Implement BMPs for non-permitted projects *Develop EPP *Follow EMS *NAVFAC MAR EV -performs spot inspections -provide training annually to CMEs and ETs *Comply with Guam E&S Regulations	2	*perform 10% (of number of construction projects) spot construction site inspections per year using in-house EV staff *perform 1 training session per year to CMEs and ETs
(5) Post Construction Runoff Control	*Comply with 2006 CNMI SWMM *Comply with EISA Sect. 438 *Comply with UFC 3-210- 10	*Implement an inspection procedure for permanent post construction stormwater BMPs to: monitor BMP deficiencies and maintenance concerns, and provide inspection findings to appropriate parties for corrective actions	*develop permanent BMP inspection procedure in Permit Year 1 *begin implementation of permanent BMP inspection procedure in permit year 2 *establish a database to house permanent BMP/IMP data for

			inventory, tracking and maintenance purposes in Permit Year 1
(6) Pollution Prevention / Good Housekeeping	*MSGP SWPPP - quarterly routine inspections, - annual comp. inspections, - annual wet weather inspect., - annual training to personnel, - discharge sampling *periodic drainage maintenance on "as- required" basis * Majority of NBG drainage facility data currently in GIS *established listing of all tenants on JRM properties and tenant agreements	*Update stormdrain mapping *Perform initial survey /inspection and update drainage facility inventory & conditions *Develop drainage inspection & cleaning program	*complete the initial survey/ inspection in permit years 1-3 *develop drainage inspection & cleaning program by permit year 1 *beginning in permit year 3, perform inspections of drainage facilities for 20% of MS4 drainage facilities annually and clean 20% of MS4 drainage facilities annually (establish a 5-year cleaning cycle) *Complete update of storm drainage facility mapping by the end of permit year 3

- 7. Annual Reports mirroring the Federal fiscal year (October 1st September 30th) will be prepared and submitted to US EPA Region IX no later than the last working day in December of that same calendar year. Annual reports shall contain:
 - A) Summary of SWMP measurable goals and actual progress for the year.
 - B) Summary of significant accomplishment in SWMP development and implementation.

Table 3-2 - OTHER SWMP REQUIREMENTS

Designate Responsible Person(s)		Determine responsible person(s) and SWMP organizational chart as part of detailed SWMP	None
Reporting	*MSGP discharge sampling	*Annual SWMP Reporting -summary of facilities inspected and identify type of inspection -discharge sampling and monitoring summary -summary of accomplishments vs. established measurable goals	*submit annual SWMP reporting by established deadlines
Estimate of square mileage served by the small MS4	*Estimate provided with application	*As mapping is updated, update square mileage estimates	None